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**FULLER, FULLER & ASSOCIATES, P.A.**

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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THE INDEPENDENCE PROJECT, INC., a  
New Jersey Non Profit Corporation, and  
RONALD MOORE, Individually,

Plaintiffs,

vs.

H.G. CLARKE, L.L.C., a New Jersey Limited  
Liability Company,

Defendant/Third-Party Plaintiff,

vs.

NA NA LIN, QING FENG BUFFET OF LIN  
INC, GULJAR SINGH, BIG BLUES SUB  
SHOP, JOHN DOE 1-10, and ABC CORP. 1-  
10,

Third-Party Defendants.

Civil Action No. 2:17-cv-06221-ES-JAD

**STIPULATION OF DISMISSAL  
AND  
CONSENT ORDER**

*Document Filed Electronically*

**IT IS HEREBY STIPULATED AND AGREED** that, in accordance with Federal Rule  
of Civil Procedure 41(a)(1)(A)(ii), plaintiffs, The Independence Project, Inc. and Ronald Moore,

herby dismiss with prejudice the above-captioned action against defendant, H.G. Clarke, L.L.C.

**IT IS FURTHER HEREBY STIPULATED AND AGREED** that, in accordance with Federal Rule of Civil Procedure 41(c)(1), third-party plaintiff, H.G. Clarke, L.L.C., hereby dismisses without prejudice the above-captioned action against third-party defendants, Na Na Lin, Qing Feng Buffet of Lin Inc, Guljar Singh, and Big Blues Sub Shop.

**IT IS FURTHER HEREBY STIPULATED AND AGREED** that, in accordance with Federal Rule of Civil Procedure 41(a)(2), this Court will retain ancillary jurisdiction to enforce the terms of the Settlement Agreement and General Release entered into among The Independence Project, Inc., Ronald Moore, and H.G. Clarke, L.L.C. Such ancillary jurisdiction will run until December 31, 2020.

LAW OFFICES OF ALAN R.  
ACKERMAN  
Attorneys for plaintiffs

By:

  
Alan R. Ackerman

Date:

4-9-2018

POST, POLAK, GOODSELL  
& STRAUCHLER, P.A.  
Attorneys for defendant

By:

/s/ Frederick B. Polak  
Frederick B. Polak

Date:

4-9-2018

**IT IS SO ORDERED:**

  
Hon. Esther Salas, U.S.D.J.

Date:

April 10, 2018